



S P I R E L A W

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Via Electronic Filing

Hon. Brian M. Cogan
Judge, United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, New York 11722

December 5, 2025

Re.: *Chela v. DKA Food Corps., et al.* Case No. 25-CV-01431 (AYS)
Motion to Extend Discovery and Motions Deadline

Dear Judge Cogan:

On behalf of Defendant, DKA Food Corps. Edwin Quezada, and Ana Hernandez (“Defendants”), in the above-referenced matter, we respectfully move this Court, in accordance with Fed. R. Civ. P. 16(b)(4) and L.R. 16.2, to amend the Court’s Scheduling Order, (ECF No. 23), to extend the discovery period for 45 days to allow the parties to complete discovery and to schedule and conduct a mediation, as necessary.

The Parties propose the Scheduling Order be amended as follows:

Event	Current Deadline	Proposed New Deadline
Discovery Deadline	December 5, 2025	January 19, 2026
Motions Deadline	December 12, 2025	January 26, 2026

This motion is based on good cause because the parties have diligently pursued discovery, but have been unable to schedule depositions despite their best efforts. This motion is made to allow the parties to complete discovery and is not intended to cause delay. Additionally, this extension will allow the Parties to engage a mediator, as necessary, and avoid the

This is the Parties’ first request to extend the discovery period.

Certification of Conference of the Parties

This motion is made following the conference of counsel, which took place via email on December 5, 2025. Plaintiff does not oppose the relief requested herein.

We thank the Court for its attention to this matter.



Respectfully,

A handwritten signature in black ink, appearing to read "Ian E. Smith". The signature is written in a cursive, flowing style.

Ian E. Smith, Esq.
Partner, Spire Law, PLLC